



RECEIVED
ELECTION
COMMISSION

Giving the attention you deserve.

NOV 16 PM 4:34

November 14, 2017

Federal Election Commission
Office of Complaint Examination
And Legal Administration
Attn: Christal Dennis, Paralegal
999 E Street NW
Washington, DC 20463

PERU FEDERAL

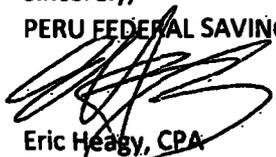
To whom it may concern:

I am responding to the matter MUR 7295 which was received by our institution's Vice Chairman Jonathan Brandt in a letter dated November 8, 2017 and received on November 13, 2017. The complaint states that Peru Federal Savings Bank made sizeable contributions to the Campaign of Brian Towne. The items listed include a total of \$2,550 from 2007 through 2016. These amounts do not represent contributions to the campaign by Peru Federal. These payments were for advertising and entry fees for golf outings. The bank routinely advertises by sponsoring golf outing flag sponsorships as a low-cost method of getting its name out into the community. We sponsor many golf outings throughout the year.

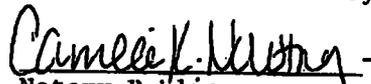
In addition to these small advertising amounts the bank participates in local golf outings each year as a way to network with current and potential customers. The bank either sends a foursome of officers to these golf outing or entertains customers by inviting them to attend and golf in these local golf outings. The golf outings that the bank selects to participate in are ones that are generally well attended and give the bank the opportunity to network with a wide audience of customers and prospects. While the checks were paid to Citizen's for Brian Towne, the bank does not consider these political contributions but rather marketing and advertising expenses as we received advertising and entry/participation in the event. I have enclosed documentation of these expenses dating back to 2013 for which we have documents retained in accordance with our record retention policy. If you have further questions regarding this matter, please feel free to contact me directly at 815-410-2311. Thank you and have a great day.

I, Eric Heagy, do hereby affirm that all of the foregoing statements are true and correct to the best of my knowledge and belief.

Sincerely,
PERU FEDERAL SAVINGS BANK


Eric Heagy, CPA
President/CEO/CFO

SUBSCRIBED AND SWORN TO and
before me this 14th day of November, 2017


Notary Public



1730 Fourth St.
P.O. Box 628
Peru, IL 61354
815.223.4300

914 Shooting Park Rd.
Peru, IL 61354
815.224.2213

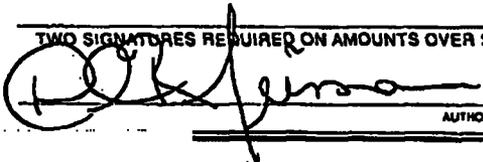
perufederalsavings.com



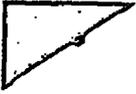
Current Date: November 13, 2017

Account Number: ;
Capture Date: July 15, 2013
Item Number: 220001833621
Posted Date: July 15, 2013
Posted Item Number: 520
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354

 1730 Fourth St. • 914 Shooting Park Rd. P.O. Box 628 • Peru, IL 61354-0628		No. 011626 <small>70-7312 2719</small>		
		CHECK DATE	CHECK NUMBER	CHECK NUMBER
PAY**Four Hundred and NO/100 Dollars**		06/27/2013	11626	400.00
TO THE CITIZENS FOR BRIAN TOWNE ORDER OF P.O. BOX 1047 LA SALLE, IL 61301		VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK		
		TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00		
		 AUTHORIZED SIGNATURE		

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016551017200



Sylvia Ballard

To: Eric Heagy
Subject: RE: Brian Towne Golf Outing

From: Eric Heagy
Sent: Wednesday, June 26, 2013 4:53 PM
To: Sylvia Ballard
Subject: RE: Brian Towne Golf Outing

Yes – The other two are coming as guests of Peru Federal. Thanks.

Eric Heagy, CPA
President
Chief Executive Officer
Peru Federal Savings Bank

From: Sylvia Ballard
Sent: Wednesday, June 26, 2013 4:48 PM
To: Eric Heagy
Subject: Brian Towne Golf Outing

Eric,

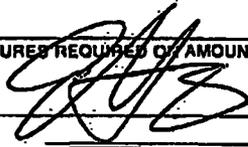
Do you want me to cut a check for all four golfers for the Brian Towne Golf Outing?

Thanks,
Sylvia

Current Date: November 13, 2017

Account Number: ;
Capture Date: May 30, 2014
Item Number: 220002066409
Posted Date: May 30, 2014
Posted Item Number: 666
Amount: 150.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354

 1730 Fourth St. • 914 Shooting Park Rd. P.O. Box 628 • Peru, IL 61354-0628		No. 012557 <small>70-7312 2719</small>		
		CHECK DATE	CHECK NUMBER	CHECK NUMBER
		05/09/2014	12557	150.00
PAY **One Hundred Fifty and NO/100 Dollars**				
TO THE ORDER OF		CITIZENS FOR BRIAN TOWNE P.O. BOX 1047 LA SALLE, IL 61301		
			VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK	
			TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00	
			 AUTHORIZED SIGNATURE	

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

P.F.S.B. #24

Current Date: November 13, 2017

Account Number: .
Capture Date: July 25, 2014
Item Number: 220002107406
Posted Date: July 25, 2014
Posted Item Number: 515
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354

 1730 Fourth St. • 914 Shooting Park Rd. P.O. Box 628 • Peru, IL 61354-0628		No. 012741		70-7312 2719
		CHECK DATE	CHECK NUMBER	CHECK NUMBER
		07/16/2014	12741	400.00
PAY **Four Hundred and NO/100 Dollars**		VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK		
TO THE ORDER OF	CITIZENS FOR BRIAN TOWNE P.O. BOX 1047 LA SALLE IL 61301		TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$10,000.00	
				AUTHORIZED SIGNATURE

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
OR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

Current Date: November 13, 2017

Account Number: ;
Capture Date: June 05, 2015
Item Number: 220002327436
Posted Date: June 05, 2015
Posted Item Number: 743
Amount: 150.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628



No. 013693 ⁷⁰⁻⁷³¹²
2719

CHECK DATE	CHECK NUMBER	CHECK NUMBER
05/21/2015	13693	150.00

PAY **One Hundred Fifty and NO/100 Dollars**

VOID AFTER 90 DAYS
PERU FEDERAL SAVINGS BANK

TO THE ORDER OF
CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE, ST. ATTY
015521017200

P.P.S

**BRIAN
TOWNE
STATES ATTORNEY**



Friday, June 19, 2015

Registration at 10:30 am

Tee off at 11:30 am

SENICA'S OAKRIDGE GOLF CLUB

Lunch served on the course

*Be a Sponsor
for
Brian Towne*

The friends of Brian Towne will hold a golf outing fund raiser Friday, June 19, 2015 at Senica's Oak Ridge Golf Club 11:30 a.m. with lunch served on the course.

The proceeds from your contributions will benefit *Brian Towne's campaign for LaSalle County States Attorney*. Please complete and return this form by June 12, 2015. Your name will be placed in the appropriate manner to recognize your support.
Thank you for your generosity!

MAY 21 2015

Check your choice of Sponsorship

Hole Sponsorship \$150.00 Half of the Golf Carts ¹³⁰⁹³ \$250.00

Refreshment Cart..... \$250.00 ⁷²³⁰

I do not wish to participate in the golf outing, but would like to send a donation. \$ _____

Business Name Peru Federal Savings Bank Person _____

Address 1730 4th St

City Peru State IL Zip 61354

Phone 815-223-4300 Fax 815-223-3909

Your Signature [Signature] Check Cash

No logos - two lines only: Peru Federal Savings Bank

Remit to and checks payable to: Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.



For Additional Information call: John Balestri - 815-223-6600 or Jim Conness - 815-228-8248

all

Current Date: November 13, 2017

Account Number:)
Capture Date: June 17, 2015
Item Number: 220002335823
Posted Date: June 17, 2015
Posted Item Number: 726
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354

 <p>Peru Federal Savings Bank 1730 Fourth St. • 914 Shooting Park Rd. P.O. Box 828 • Peru, IL 61354-0628</p>		No. .013750		70-7312 2719
		CHECK DATE	CHECK NUMBER	CHECK NUMBER
		06/10/2015	13750	400.00
<p>PAY **Four Hundred and NO/100 Dollars**</p>		<p>VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK</p>		
<p>TO THE ORDER OF</p>	<p>CITIZENS FOR BRIAN TOWNE P.O. BOX 1047 LA SALLE IL 61301</p>		<p>TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00</p>	
				<p>AUTHORIZED SIGNATURE</p>

P.F.S.B. #91

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

Current Date: November 13, 2017

Account Number: ;
Capture Date: May 24, 2016
Item Number: 220002560075
Posted Date: May 24, 2016
Posted Item Number: 754
Amount: 150.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628



No. 014735 ⁷⁰⁻⁷³¹²
2718

CHECK DATE	CHECK NUMBER	CHECK NUMBER
05/17/2016	14735	150.00

PAY **One Hundred Fifty and NO/100 Dollars**

VOID AFTER 90 DAYS
PERU FEDERAL SAVINGS BANK

TO THE ORDER OF
CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

PFSE 2

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

**BRIAN
TOWNE
STATES ATTORNEY**



Friday, June 10, 2016

Registration at 10:30 am

Tee off at 11:30 am

SENICA'S OAK RIDGE GOLF CLUB

Lunch served on the course

Citizens for Towne State's Attorney will hold a golf outing fund raiser **Friday, June 10, 2016** at Senica's Oak Ridge Golf Club 11:30 a.m. with lunch served on the course.

The proceeds from your contributions will benefit **Brian Towne's campaign for LaSalle County States Attorney**. Please complete and return this form by **June 3, 2016**. Your name will be placed in the appropriate manner to recognize your support.
Thank you for your generosity!

PAID
14735 7230

Check your choice of Sponsorship

Hole Sponsorship \$150.00

Half of the Golf Carts \$250.00

Refreshment Cart \$200.00

Food Sponsor \$300.00

I do not wish to participate in the golf outing, but would like to send a donation. \$ _____

Business Name Peru Federal Savings Bank Person _____

Address 1730 4th St.

City Peru State IL Zip 61357

Phone 815-223-4300 Fax _____

Your Signature [Signature] Check Cash

No logos - two lines only: Peru Federal Savings Bank

Remit to and checks payable to: **Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301**

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.



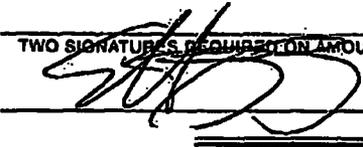
For Additional Information call: John Balestri - 815-223-8600 or Jim Conness - 815-228-8248

[Handwritten initials]

Current Date: November 13, 2017

Account Number: ;
Capture Date: June 09, 2016
Item Number: 220002571552
Posted Date: June 09, 2016
Posted Item Number: 381
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354

 1730 Fourth St. • 814 Shooting Park Rd. P.O. Box 628 • Peru, IL 61354-0628		No. 014779		70-7312 2719
		CHECK DATE	CHECK NUMBER	CHECK NUMBER
		05/31/2016	14779	400.00
PAY **Four Hundred and NO/100 Dollars**		VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK		
TO THE ORDER OF CITIZENS FOR BRIAN TOWNE P.O. BOX 1047 LA SALLE IL 61301	TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00			 AUTHORIZED SIGNATURE

PFSB #97

PAY TO THE ORDER OF
 PERU FEDERAL SAVINGS BANK
 FOR DEPOSIT ONLY
 CITIZENS FOR TOWNE ST. ATTY
 016531017200

